

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA       §  
                                              §  
v.                                       §     No. 4:20CR373  
                                              §     Judge Jordan  
URI RETO SEISER                   §

**FILED**

**FEB 10 2021**

**FIRST SUPERSEDING INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

**Count One**

Violation: 18 U.S.C. § 922(g)(1)  
(Possession of Ammunition by a  
Convicted Felon)

On or about November 14, 2020, in the Eastern District of Texas and elsewhere,  
the defendant, **URI RETO SEISER**, did knowingly and unlawfully possess in and  
affecting interstate or foreign commerce, forty-nine (49) rounds of 9mm Caliber  
ammunition bearing the markings “FC 20 9MM LUGER” on the head-stamp, while  
knowing that he had been convicted of a crime punishable by imprisonment for a term  
exceeding one year.

In violation of 18 U.S.C. § 922(g)(1).

**Count Two**

Violation: 18 U.S.C. § 922(g)(1)  
(Felon in Possession of Firearm)

On or about November 14, 2020, in the Eastern District of Texas and elsewhere,  
the defendant, **URI RETO SEISER**, did knowingly and unlawfully possess in and

affecting interstate or foreign commerce, a Polymer 80, 9mm semi-automatic pistol, no serial number, while knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year.

In violation of 18 U.S.C. § 922(g)(1).

**Count Three**

Violation: 18 U.S.C. § 2261A(1)  
(Stalking)

On or about November 14, 2020, in the Eastern District of Texas and elsewhere, the defendant, **URI RETO SEISER**, did travel in interstate commerce, that is, from California to Texas with the intent, kill, injure, harass, or intimidate another person, and in the course of and as a result of such travel or presence did place that person in reasonable fear of death or serious bodily injury.

In violation of 18 U.S.C. § 2261A.

**Count Four**

Violation: 18 U.S.C. § 924(b)  
(Transporting Firearm to Commit  
a Felony)

On or about November 14, 2020, in the Eastern District of Texas and elsewhere, the defendant, **URI RETO SEISER**, with intent to commit therewith an offense punishable by imprisonment for a term exceeding one year, or with knowledge or reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year is to be committed therewith, namely stalking, did knowingly

transport, in and affecting interstate or foreign commerce, a Polymer 80, 9mm semi-automatic pistol, no serial number.

In violation of 18 U.S.C. § 924(b).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

Pursuant to 18 U.S.C. § 924(d)(1) by 28 U.S. C. § 2461(c)

As a result of the commission of the foregoing offense charged in Count One, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) by 28 U.S.C. § 2461(c) any firearm or ammunition involved in a violation of 18 U.S.C. § 922(g)(1), namely, the following:

- a. forty-nine (49) rounds of 9mm Caliber ammunition bearing the markings "FC 20 9MM LUGER" on the head-stamp;**
- b. a Polymer 80, 9mm semi-automatic pistol, no serial number.**

A TRUE BILL



\_\_\_\_\_  
GRAND JURY FOREPERSON

NICHOLAS J. GANJEI  
ACTING UNITED STATES ATTORNEY



\_\_\_\_\_  
TRACEY M. BATSON  
Assistant United States Attorney

Date: 2/10/21

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:20CR373
	§	Judge Jordan
URI RETO SEISER	§	

**NOTICE OF PENALTY**

**Counts One and Two**

Violation: 18 U.S.C. § 922(g)(1)

Penalty: Imprisonment of not more than ten (10) years, a fine not to exceed \$250,000 or twice the pecuniary gain to the defendant or loss to the victim, or both; and a term of supervised release of not more than three (3) years.

If the Court determines that the defendant is an Armed Career Offender under 18 U.S.C. 924(e), imprisonment of not less than 15 years and not more than life, a fine not to exceed \$250,000 or twice the pecuniary gain to the defendant or loss to the victim, or both; and a term of supervised release of not more than five (5) years.

Special Assessment: \$100.00

**Count Three**

Violation: 18 U.S.C. § 2261A(1)

Penalty: Imprisonment of not more than five (5) years, a fine not to exceed \$250,000, or both; and a term of supervised release of not more than three (3) years.

Special Assessment: \$100.00

**Count Four**

Violation: 18 U.S.C. § 924(b)

Penalty: Imprisonment of not more than ten (10) years, a fine not to exceed \$250,000, or both; and a term of supervised release of not more than 3 years.

Special Assessment: \$100.00